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FINANCIAL ASSET MANAGEMENT
SYSTEMS, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

RENEE GOGGANS, an)	Case No. 3:16-CV-01502-H-JMA
individual)	
)	
Plaintiff,)	JOINT MOTION TO DISMISS
)	
vs.)	
)	
FINANCIAL ASSET)	
MANAGEMENT SYSTEM, INC.,)	
a corporation)	
Defendant.)	

Pursuant to *Federal Rule of Civil Procedure* 41(a)(1)(A)(ii) and Local Rule 7.2, Plaintiff RENEE GOGGANS and Defendant FINANCIAL ASSET MANAGEMENT SYSTEM, INC. jointly move the Court to dismiss the entire case with prejudice. Each party shall bear her/its own attorney's fees, expenses and costs.

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1 Dated: August 11, 2016

ANKCORN LAW FIRM, PC

2 By: /s/ Mark Ankcorn

3 Attorneys for Plaintiff
4 RENEE GOGGANS

5 Dated: August 11, 2016

CARLSON & MESSER LLP

6 By: /s/ J. Grace Felipe

7 Jeanne L. Zimmer
8 J. Grace Felipe
9 Attorneys for Defendant
10 FINANCIAL ASSET
11 MANAGEMENT, INC.
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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Mark Ankcorn, counsel for Plaintiff, RENEE GOGGANS, and that I have obtained Mr. Ankcorn's authorization to affix his electronic signature to this document.

/s/ J. Grace Felipe

J. Grace Felipe